

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) TRAVIS WILLIAMS)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-16-786-M
)	
(2) LM GENERAL INSURANCE CO.,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, LM General Insurance Company (“Defendant”) hereby removes the above-captioned action from the District Court of Oklahoma County, State of Oklahoma, to the United States District Court for the Western District of Oklahoma. In support of removal, Defendant states the following:

INTRODUCTION

1. On June 9, 2016, Plaintiff commenced this action in the District Court of Oklahoma County, State of Oklahoma, Case No. CJ-2016-2936. Plaintiff’s Petition alleged claims for breach of contract and bad faith against Defendant.

2. Defendant answered Plaintiff’s Petition on July 5, 2016

3. Upon information and belief, Plaintiff is a citizen of the State of Oklahoma. Defendant is a corporation organized under the laws of the State of Illinois with its principal place of business in Boston, Massachusetts.

4. The amount in controversy exceeds the sum or value of \$75,000. (*See* Exhibit 2, Petition ¶¶ 11, 12, and “WHEREFORE” Paragraph).

5. This action is removable under 28 U.S.C. §§ 1332 and 1441 as there is complete diversity between Plaintiff and Defendant and the amount in controversy exceeds the sum or value of \$75,000. (*See* Exhibit 2.)

6. Pursuant to 28 U.S.C. § 1446(b)(1), Defendant timely removed this action within thirty (30) days of the receipt by the Defendant of a copy of the Petition on June 13, 2016.

7. Pursuant to LCvR81.2(a), true and correct copies of the Petition, Defendant’s Answer, and all other documents filed or served in the Oklahoma County District Court, together with a copy of the docket sheet, are attached hereto as Exhibits “1” through “4”.

8. The Western District of Oklahoma includes the state judicial district in which Plaintiff filed his Petition.

9. Contemporaneous with Defendant's filing of this Notice, Defendant will serve written notice to Plaintiff's counsel of the filing, as required by 28 U.S.C. § 1446(d).

10. Defendant shall likewise file a true and correct copy of its Notice of Removal with the Clerk of the District Court in and for Oklahoma County, State of Oklahoma, as required by 28 U.S.C. §1446(d).

CONCLUSION

For the foregoing reasons, this Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 and removal is appropriate.

Respectfully submitted,

s/William W. O'Connor

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**ATTORNEYS FOR DEFENDANT,
LM GENERAL INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I herby certify that on the 12th day of July, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Dacia Abel

ATTORNEYS FOR PLAINTIFF

s/William W. O'Connor

William W. O'Connor